

EXHIBIT 115

Portions of Zuffa Concise Statement of Facts Undisputed

Zuffa's Unaddressed and Undisputed Facts	Plaintiffs' Relevant CSOF
Since 2001, the number of UFC events steadily increased. SUF ¶ 7.	¶ 27
Fighter compensation has increased since Zuffa acquired the UFC, including through the Class Period. SUF ¶ 8	¶ 26
Zuffa often pays fighters more than other MMA promoters. SUF ¶¶ 8, 10.	¶ 26
The term of the agreement is typically 20 months with the possibility of tolling for events such as injury, retirement, and refusal to compete. An athlete's average career at Zuffa lasts two years and the median is 0.82 years. By contrast, for athletes who competed in at least one Zuffa bout, the total average career length in MMA overall is 8.7 years. SUF ¶ 12.	¶ 9
At various points in time, Zuffa's Promotional Agreements have included an exclusive negotiation period of 60 or 90 days. The Promotional Agreements also normally have a right to match clause, which provides Zuffa the right to match a competing promoter's offer for a short period of time after the expiration of the agreement. During the matching period, athletes can receive offers from other promoters. Zuffa then has 15 business days to match or beat the competitor's offer. Zuffa staggers the expiration dates of its agreements with athletes, which means there is a constant supply of athletes coming available whom may reach free agency only weeks apart. SUF ¶ 14.	¶ 8(c)
Other MMA promoters have exclusivity provisions in their promotional agreements with athletes, including Bellator, Strikeforce, ONE Championship, and World Series of Fighting. SUF ¶ 15.	¶ 10
Other MMA promotions compete with Zuffa to put on MMA events. SUF ¶ 18.	¶ 25
During the Class Period, entrants to the MMA promotion business PFL, ONE, and ACB expanded output. ONE increased its output from one event its first year in 2011 to 16 events in 2016; PFL increased its output from one event its first year in 2012 to eight events in 2016; and ACB increased its output from one event its first year in 2012 to 22 events in 2016. SUF ¶ 19.	¶ 27
New MMA promoters are continuing to emerge. SUF ¶ 20.	¶¶ 21-24 & n.42
MMA promoters have been able to access talented MMA athletes during the Class Period, both from the pool of former UFC fighters and by growing its own up-and-coming talent. SUF ¶ 21.	¶¶ 19, 21-24
In the Ranked Market, from 2011 to 2016, Zuffa had only 18.1% of total available athletes under contract, and Zuffa never had over 22% of the total athletes in Dr. Singer's Ranked Market in any year. SUF ¶ 21.	¶ 2
MMA promoters have successfully outbid Zuffa and contracted with athletes during the period where Zuffa had a right to match a competitor's compensation. SUF ¶ 22.	¶ 19